# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE ) LEAGUE PLAYERS' CONCUSSION )	No. 12-md-2323 (AB)	
INJURY LITIGATION )	MDL No. 2323	
	SHORT FORM COMPLAINT	
THIS DOCUMENT RELATES TO:	IN RE: NATIONAL FOOTBALL	
)	LEAGUE PLAYERS' CONCUSSION	
Plaintiff's Master Administrative Long ) Form Complaint v. National Football )	INJURY LITIGATION	
League [et al.],	JURY TRIAL DEMANDED	
Davis et al v. National Football League		
3: 12-cv-01864		

## **SHORT FORM COMPLAINT**

- 1. Plaintiff Henry Taylor brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.
- 2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.
- 3. Plaintiff incorporates by reference the allegations (as designated below) of the Master Administrative Long Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.
- 4. Plaintiff Henry Taylor is a resident and citizen of the state of South Carolina, and claims the damages set forth below.
- 5. On information and belief, Plaintiff Henry Taylor sustained repetitive, traumatic sub-concussive and concussive head impacts during NFL games and practices. On information and belief, Plaintiff suffers from symptoms of brain injury

caused by the repetitive, traumatic sub-concussive and concussive impacts the Plaintiff sustained during NFL games and practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

Plaintiffs claim damages as a result of:

6.

	x Injury to Himself	
_	xEconomic Loss	
	xLoss of services	
<u>DEFENDANTS</u>		
7.	Plaintiff brings this case against the following Defendant in this action:	
	xNational Football League	
	xNFL Properties, LLC	
8.	Plaintiff played in the National Football League for the following teams:	
Detroit Li	ons, Atlanta Falcons, Miami Dolphins, and Chicago Bears.	
CAUSES OF ACTION		
9.	Plaintiff herein adopts by reference the following Counts of the Master	
Administi	rative Long-Form Complaint, along with the factual allegations incorporated by	
reference	e in those Counts:	
	xCount I (Action for declaratory relief – liability against the NFL)	
_	xCount II (Medical Monitoring against the NFL)	
	xCount IV (Fraudulent Concealment against the NFL)	
	xCount V (Fraud against the NFL)	

x	Count VI (Negligent misrepresentation against the NFL)
x	Count X (Negligence post 1994 against the NFL)
x	_Count XI (Loss of Consortium against the NFL)
x	Count XII (Negligent Hiring against the NFL)
x	Count XIII (Negligent Retention against the NFL)
x	_Count XVIII (Civil Conspiracy/Fraudulent Concealment against the
	NFL)

# **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose law will govern this action;
- For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorney's fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

## **JURY DEMANDED**

Pursuant to Rule 38, Federal Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury.

#### **RESPECTFULLY SUBMITTED:**

\_s/ Sol H.Weiss\_\_\_\_\_

Sol H. Weiss

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